

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

THE TRUSTEES OF PURDUE  
UNIVERSITY,

Plaintiff,

v.

STMICROELECTRONICS N.V.,  
STMICROELECTRONICS  
INTERNATIONAL N.V., and  
STMICROELECTRONICS, INC,

Defendants.

CIVIL ACTION NO. 6:21-CV-00727-ADA

JURY TRIAL DEMANDED

**DECLARATION OF HALIMA SHUKRI NDAI**

I, Halima Shukri Ndai, declare as follows:

1. I am an attorney at Shore Chan LLP and counsel of record for Plaintiff The Trustees of Purdue University (“Purdue”) in the above-captioned matter. I am over 21 years of age and am competent to make this declaration. All the statements set forth herein are true and correct and are based upon my personal knowledge.

2. Attached as Exhibit 1 is a true and correct copy of Defendants’ Proposed Claim Terms for Construction, dated January 18, 2022.

3. Attached as Exhibit 2 is a true and correct copy of Defendants’ Proposed Claim Constructions, dated January 31, 2022.

4. Attached as Exhibit 3 is a true and correct copy of Defendants’ Identification of Extrinsic Evidence for Claim Construction, dated February 7, 2022.

5. Attached as Exhibit 4 is a true and correct copy of excerpts from the File History of U.S. Patent No. 8,035,112.

6. Attached as Exhibit 5 is a true and correct copy of email exchanges between counsel for the parties related to meet and confer regarding claim construction, dated February 14, 2022.

7. Attached as Exhibit 6 is a true and correct copy of excerpts from the File History of U.S. Patent No. 7,498,633.

8. Attached as Exhibit 7 is a true and correct copy of Vivek Subramanian's Curriculum Vitae, which Defendants served on February 7, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on March 14, 2022 in Dallas, Texas.

/s/ Halima Shukri Ndai

Halima Shukri Ndai